



***National  
Environmental  
Achievement Track***

***Application Form***

Western Area Power Administration

Name of facility

Department of Energy

Name of parent company (if any)

12155 W. Alameda Parkway

Street address

PO Box 281213

Street address (continued)

Lakewood, CO 80228

City/State/Zip code

Give us information about your contact person for the  
National Environmental Achievement Track Program.

Name Bill Karsell

Title Environmental Manager

Phone 720.962.7252

Fax 720.962.7263

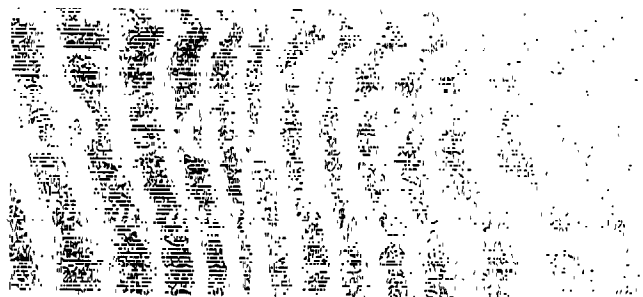
E-mail karsell@wapa.gov

***Why do we need this information?***

EPA needs background information on your facility to evaluate your application.

***What do you need to do?***

- Provide background information on your facility.
- Identify your environmental requirements.



1 What do you do or make at your facility?

Western Area Power Administration markets and transmits hydroelectric power from 53 federal projects in 15 western states.

2 List the Standard Industrial Classification (SIC) code(s) or North American Industrial Classification System (NAICS) codes that you use to classify business at your facility.

SIC  
49

NAICS

3 Does your company meet the Small Business Administration definition of a small business for your sector?

☐ Yes

☒ No

4 How many employees (full-time equivalents) currently work at your facility?

☐ Fewer than 50

☐ 50-99

☐ 100-499

☐ 500-1,000

☒ More than 1,000

5 Does your facility have an EPA ID number(s)?

If yes, list in the right-hand column.

☒ Yes

☐ No

Western has EPA ID numbers for each of its facilities, including offices, substations, and communications sites in a 15-state service territory. A list of our facilities and their EPA ID numbers is attached.

6 Identify the environmental requirements that apply to your facility. Use the Environmental Requirements Checklist, at the back of the instructions, as a reference. List your requirements to the right or enclose a completed Checklist with your application.

A completed checklist is attached.

7 Check the appropriate box in the right-hand column.

☐ I've listed the requirements above.

☒ I've enclosed the Checklist with my application.

8 Optional: Is there anything else you would like to tell us about your facility?

Each of the environmental requirements listed beside item 6, above, applies to at least one Western facility. However, none apply to all facilities.

**Why do we need this information?**

Facilities must have an operating Environmental Management System (EMS) that meets certain requirements.

**What do you need to do?**

- Confirm that your EMS meets the Achievement Track requirements.
- Tell us if you have completed a self-assessment or have had a third-party assessment of your EMS.

1 Check **yes** if your EMS meets the requirements for each element below as defined in the instructions.

a. Environmental policy ☒ Yes

b. Planning ☒ Yes

c. Implementation and operation ☒ Yes

d. Checking and corrective action ☒ Yes

e. Management review ☒ Yes

2 Have you completed at least one EMS cycle (plan-do-check-act)? ☒ Yes

3 Did this cycle include both an EMS and a compliance audit? ☒ Yes

4 Have you completed an objective self-assessment or third-party assessment of your EMS? ☒ Yes

If yes, what method of EMS assessment did you use?

☐ Self-assessment

☐ GEMI

☐ Other

☐ CEMP

☒ Third-party assessment

☐ ISO 14001 Certification

☒ Other EPA

**Why do we need this information?**

Facilities must show that they are committed to improving their environmental performance. This means that you can describe past achievements and will make future commitments.

**What do you need to do?**

Refer to the Environmental Performance Table in the instructions to answer questions 1 and 2.

- 1 Describe your past achievements for at least two environmental aspects. If you need more space than is provided, attach copies of this page.

**Note to small facilities:** If you qualify as a small facility as defined in the instructions, you are required to report past achievement for at least one environmental aspect.

**First aspect you've selected**

What aspect have you selected?	What was the previous level (2 years ago)?		What is the current level?	
	Quantity	Units	Quantity	Units
Emissions of Greenhouse Gases	95	kW	140	kW
	228,000	kWh/year	336,000	kWh/year
<p>i. How is the current level an improvement over the previous level?</p> <p>During the last two years Western installed 8 photo-voltaic projects in 5 locations producing the equivalent of the energy used by 34 residences. Lifetime emissions offset by these projects amount to 2,700 tons of CO<sub>2</sub>, 10 tons of NO<sub>x</sub> and 19 tons of SO<sub>x</sub>. We have also directly benefitted 14 power customers by performing PV site evaluations, designing PV systems, evaluating RFPs as their PV technical advisor, writing grant proposals on their behalf, inspecting PV installations, and providing training. Our staff also provide PV technical assistance and instruction to Federal agencies through the DOE Federal Energy Management Program.</p> <p>ii. How did you achieve this improvement?</p> <p>Western has evaluated our facilities to identify the best candidates for PV installations, acquired technical knowledge, designed and installed the systems, and monitored operations to achieve the most beneficial use. We have also educated our power customers on how PV and benefit them and helped them design and install their own systems.</p>				

**Second aspect you've selected**

What aspect have you selected?	What was the previous level (2 years ago)?		What is the current level?	
	Quantity	Units	Quantity	Units
Habitat Impact	0	young fish in upper basin	1,500	3-year old fish
			~375	2-year old fish
			~375	1-year old fish

i. How is the current level an improvement over the previous level?

In the voluntary staff support and funding for endangered pallid sturgeon recovery in the Missouri River program, we have brought about a healthier age distribution in the sturgeon population through introductions of juvenile fish. This success is expected to provide recruitment to the breeding adult population and ensure the species continued existence. Western's voluntary technical and financial participation in the pallid sturgeon recovery program earned us outstanding contribution awards from the American Fisheries Society (1999) and from the U.S. Fish and Wildlife Service (2000).

ii. How did you achieve this improvement?

Western emphasized using resources for ecosystem improvements rather than just for research. We collaborated with other federal and state agencies, and industry.

2. Select at least four environmental aspects (no more than two from any one category) from the Environmental Performance Table in the instructions and then tell us about your future commitments. If you need more space than is provided, attach copies of this section.

**Note to small facilities:** If you are a small facility, you are required to make commitments for at least two environmental aspects in two different categories.

**First aspect you've selected**

- a. What is the aspect?
- Green or environmentally preferable power purchases for Western-owned facilities
- b. Is this aspect identified as significant in your EMS?
- ☐ Yes ☒ No
- c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output.
- ☒ Option A:  
Absolute value 0  
(Quantity/Units)
- ☐ Option B:  
In terms of  
units of production (Quantity/Units)  
or output

d. What is the improvement you are committing to over the next three years? You may choose to state this as an absolute value or in terms of units of production or output.

☒ Option A:  
Absolute value  
50,000 kWh/mo in 2000  
51,500 kWh/mo by 2005  
53,750 kWh/mo by 2010  
(Quantity/Units)

(Quantity/Units)

e. How will you achieve this improvement?

Western will buy green or environmentally preferable energy for Western's own facilities. We have already contracted for 50,000 kWh of wind power per month for our Lakewood, Colorado office. We are also developing a "Green Tagging" program so that other federal facilities can receive green power via our transmission system. Through this initiative we are supporting development of new clean power sources. (The three-year commitment values are only for the Lakewood Office, which has purchased the maximum amount available. Significant additional wind and other green power is limited, but as it becomes available, Western's other facilities throughout the 15-state service area will obtain contracts.)

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### Second aspect you've selected

a. What is the aspect?

Waste minimization

b. Is this aspect identified as significant in your EMS?

☐ Yes ☒ No

c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output.

☒ Option A:  
Absolute value  
>50% of all waste recycled  
(Quantity/Units)

☐ Option B:  
In terms of  
units of production  
or output  
(Quantity/Units)

d. What is the improvement you are committing to over the next three years? You may choose to state this as an absolute value or in terms of units of production or output.

☒ Option A:  
Absolute value  
> 74 % of all waste recycled  
(Quantity/Units)

☐ Option B:  
In terms of  
units of production  
or output  
(Quantity/Units)

e. How will you achieve this improvement?

Western aggressively recycles wastes. Most wastes come from large, high voltage electrical equipment and paving material, and vary widely in quantity from year to year. All Western offices have active recycling programs. Every employee in our Lakewood, Colorado office has an individual, desk-side recycling container. A sample container label is attached.

**Third aspect you've selected**

- a. What is the aspect?
- b. Is this aspect identified as significant in your EMS?
- c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output.
- d. What is the improvement you are committing to over the next three years? You may choose to state this as an absolute value or in terms of units of production or output.
- e. How will you achieve this improvement?

**Sulfur Hexafluoride (SF<sub>6</sub>) emissions reduction**

☐ Yes ☒ No

☒ Option A:  
Absolute value Unknown  
(Quantity/Units)

☐ Option B:  
In terms of  
units of production (Quantity/Units)  
or output

☒ Option A:  
Absolute value 25% reduction  
(Quantity/Units)

☐ Option B:  
In terms of  
units of production (Quantity/Units)  
or output

SF<sub>6</sub> is a dielectric gas used in high-voltage transmission equipment. It is also a greenhouse gas nearly 25,000 times as strong as carbon dioxide. Through a program begun this year, Western will reduce our emissions of SF<sub>6</sub> by at least 25 percent through aggressively identifying and stopping leaks, and by improving SF<sub>6</sub> handling practices. We assisted the Electric Power Research Institute in developing, and we are using an Infrared-laser camera to detect minute leaks of this otherwise invisible gas from our equipment.

**Fourth aspect you've selected**

- a. What is the aspect?
- b. Is this aspect identified as significant in your EMS?
- c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output.
- d. What is the improvement you are committing to over the next three years? You may choose to state this as an absolute value or in terms of units of production or output.

**Upper Colorado River endangered species recovery**

☒ Yes ☐ No

☒ Option A:  
Absolute value (See attachment)  
(Quantity/Units)

☐ Option B:  
In terms of  
units of production (Quantity/Units)  
or output

☒ Option A:  
Absolute value (See attachment)  
(Quantity/Units)

☐ Option B:  
In terms of  
units of production (Quantity/Units)  
or output



e. How will you achieve this improvement?

Western will continue to volunteer financial and technical support to the Upper Colorado River Endangered Species Recovery Program. Western staff have chaired the Biology Committee for the past three years. We will continue collaboration with federal, state and local agencies, tribes, and non-governmental organizations to recover endangered native species. Western contributes leadership, staffing and approximately 49% of the cost of program participation including capital project costs.

***Why do we need this information?***

Facilities must demonstrate their commitment to public outreach and performance reporting. You should have appropriate mechanisms in place to identify community concerns, to communicate with the public, and to provide information on your environmental performance.

***What do you need to do?***

- Describe your approach to public outreach.
- List three references who are familiar with your facility.

- 1 How do you identify and respond to community concerns?

NEPA documentation and public involvement, public noticing, website posting, power customer meetings, Closed Circuit publication, Energy Service Bulletin, other

- 2 How do you inform community members of important matters that affect them?

Same, plus EPCRA/TRI reporting

- 3 How will you make the Achievement Track Annual Performance Report available to the public?

☒ Website [www.wapa.gov/CSO/cpo/enviro/default.htm](http://www.wapa.gov/CSO/cpo/enviro/default.htm)

☒ Newspaper

☐ Open Houses

☒ Other

Western and DOE publications and news releases

Public meetings for Western projects

4 Are there any ongoing citizen suits against your facility? ☐ Yes ☒ No

If yes, describe briefly in the right-hand column.

5 List references below

	Organization	Name	Phone number
Representative of a Community/ Citizen Group	North Dakota Intertribal Reinternment Committee	Elgin Crows Breast	701-627-4748
State/Local Regulator	North Dakota Division of Consolidated Laboratories - Waste Management	Christine Roob	701-221-5166
Other community/local reference	Park County, Wyoming Planning Commission	Bob Swanson, Chair	307-587-5601

On behalf of Western Area Power Administration  
[my facility],

I certify that

- I have read and agree to the terms and conditions, as specified in the *National Environmental Achievement Track Program Description* and in the *Application Instructions*;
- I have personally examined and am familiar with the information contained in this Application (including, if attached, the *Environmental Requirements Checklist*). The information contained in this Application is, to the best of my knowledge and based on reasonable inquiry, true, accurate, and complete, and I have no reason to believe the facility would not meet all program requirements;
- My facility has an environmental management system (EMS), as defined in the Achievement Track EMS requirements, including systems to maintain compliance with all applicable federal, state, tribal, and local environmental requirements, in place at the facility, and the EMS will be maintained for the duration of the facility's participation in the program;
- My facility has conducted an objective assessment of its compliance with all applicable federal, state, tribal, and local environmental requirements, and the facility has corrected all identified instances of potential or actual noncompliance;
- Based on the foregoing compliance assessment and subsequent corrective actions (if any were necessary), my facility is, to the best of my knowledge and based on reasonable inquiry, currently in compliance with applicable federal, state, tribal, and local environmental requirements.

I agree that EPA's decision whether to accept participants into or remove them from the National Environmental Achievement Track is wholly discretionary, and I waive any right that may exist under any law to challenge EPA's acceptance or removal decision.

I am the senior facility manager and fully authorized to execute this statement on behalf of the corporation or other legal entity whose facility is applying to this program.

Signature/Date

Printed Name/Title Michael S. HacsKaylo

Facility Name Western Area Power Administration

Facility Street Address (See attachment)

Facility ID Numbers (See attachment)

The National Environmental Performance Track is a U.S. Environmental Protection Agency program. Please direct inquiries to 1-888-339-PTRK or e-mail [ptrack@indecon.com](mailto:ptrack@indecon.com). Mail completed applications to:

The Performance Track Information Center  
c/o Industrial Economics Incorporated  
2067 Massachusetts Avenue  
Cambridge, MA 02140

## National Environmental Achievement Track

### *Environmental Requirements Checklist*

The following Checklist is provided to assist facilities in answering Section A, "Tell us about your facility," Question 6. The Checklist is given to help facilities identify the major federal, state, tribal, and local environmental requirements applicable at their facilities. The Checklist is not intended to be an exhaustive list of all environmental requirements that may be applicable at an individual facility.

If you use this Checklist and choose to submit it with your application, fill in your facility information below and enclose the completed Checklist with your application (see instructions).

**Facility Name:** Western Area Power Administration  
**Facility Location:** 12155 W. Alameda Pkwy., POB 281213, Lakewood, CO 80228  
**Facility ID Number(s):** See attached facility ID number sheet  
(attach additional sheets if necessary)

#### **Air Pollution Regulations**

1. National Emission Standards for Hazardous Air Pollutants (40 CFR 61)
2. Permits and Registration of Air Pollution Sources
3. General Emission Standards, Prohibitions and Restrictions
4. Control of Incinerators
5. Process Industry Emission Standards
6. Control of Fuel Burning Equipment
7. Control of VOCs
8. Sampling, Testing and Reporting
9. Visible Emissions Standards
10. Control of Fugitive Dust
11. Toxic Air Pollutants Control
12. Vehicle Emissions Inspections and Testing

Check All  
That Apply

x

**Other Federal, State, Tribal or Local Air Pollution Regulations Not Listed Above (identify)**

13. Corresponding state regulations
14.

#### **Hazardous Waste Management Regulations**

- |  |   |
|--|---|
| 1. Identification and Listing of Hazardous Waste (40 CFR 261)  |   |
| - Characteristic Waste   | X |
| - Listed Waste   | X |
| 2. Standards Applicable to Generators of Hazardous Waste (40 CFR 262)                                      |   |
| - Manifesting  | X |
| - Pre-transport requirements   | X |
| - Record keeping/reporting   | X |
| 3. Standards Applicable to Transporters of Hazardous Waste (40 CFR 263)                                    |   |
| - Transfer facility requirements   |   |
| - Manifest system and record-keeping   | X |
| - Hazardous waste discharges   | X |
| 4. Standards for Owners and Operators of TSD Facilities (40 CFR 264)                                       |   |
| - General facility standards   |   |
| - Preparedness and prevention  |   |
| - Contingency plan and emergency procedures  |   |
| - Manifest system, Record keeping and reporting  |   |
| - Groundwater protection   |   |
| - Financial requirements   |   |
| - Use and management of containers   |   |
| - Tanks  |   |
| - Waste piles  |   |
| - Land treatment   |   |
| - Incinerators   |   |
| 5. Interim Status Standards for TSD Owners and Operators (40 CFR 265)                                      |   |
| 6. Interim Standards for Owners and Operators of New Hazardous Waste Land Disposal Facilities (40 CFR 267) |   |
| 7. Administered Permit Program (Part B) (40 CFR 270)   |   |

**Other Federal, State, Tribal or Local Hazardous Waste Management Regulations Not Listed Above (identify)**

- |                                    |  |
|------------------------------------|--|
| 8. Corresponding state regulations |  |
| 9.                                 |  |

**Hazardous Materials Management**

- |  |   |
|--|---|
| 1. Control of Pollution by Oil and Hazardous Substances (33 CFR 153)                               | X |
| 2. Designation of Reportable Quantities and Notification of Hazardous Materials Spill (40 CFR 302) | X |
| 3. Hazardous Materials Transportation Regulations (49 CFR 172-173)                                 | X |
| 4. Worker Right-to-Know Regulations (29 CFR 1910.1200)   | X |
| 5. Community Right-to-Know Regulations (40 CFR 350-372)  | X |

**Other Federal, State, Tribal or Local Hazardous Materials Management Regulations Not Listed Above (identify)**

- |                                    |  |
|------------------------------------|--|
| 6. Corresponding state regulations |  |
| 7.                                 |  |

### **Solid Waste Management**

- |  |  |
|--|--|
| 1. Criteria for Classification of Solid Waste Disposal Facilities and Practices (40 CFR 257) |  |
| 2. Permit Requirements for Solid Waste Disposal Facilities                                   |  |
| 3. Installation of Systems of Refuse Disposal  |  |
| 4. Solid Waste Storage and Removal Requirements  |  |
| 5. Disposal Requirements for Special Wastes  |  |

### **Other Federal, State, Tribal or Local Solid Waste Management Regulations Not Listed Above (identify)**

- |    |  |
|----|--|
| 6. |  |
| 7. |  |

### **Water Pollution Control Requirements**

- |   |   |
|---|---|
| 1. Oil Spill Prevention Control and Countermeasures (SPCC) (40 CFR 112)                                 | X |
| 2. Designation of Hazardous Substances (40 CFR 116)   | X |
| 3. Determination of Reportable Quantities for Hazardous Substances (40 CFR 117)                         | X |
| 4. NPDES Permit Requirements (40 CFR 122)   | X |
| 5. Toxic Pollutant Effluent Standards (40 CFR 129)  | X |
| 6. General Pretreatment Regulations for Existing and New Sources (40 CFR 403)                           |   |
| 7. Organic Chemicals Manufacturing Point Source Effluent Guidelines and Standards (40 CFR 414)          |   |
| 8. Inorganic Chemicals Manufacturing Point Source Effluent Guidelines and Standards (40 CFR 415)        |   |
| 9. Plastics and Synthetics Point Source Effluent Guidelines and Standards (40 CFR 416)                  |   |
| 10. Water Quality Standards   | X |
| 11. Effluent Limitations for Direct Dischargers   |   |
| 12. Permit Monitoring/Reporting Requirements  |   |
| 13. Classifications and Certifications of Operators and Superintendents of Industrial Wastewater Plants |   |
| 14. Collection, Handling, Processing of Sewage Sludge   |   |
| 15. Oil Discharge Containment, Control and Cleanup  | X |
| 16. Standards Applicable to Indirect Discharges (Pretreatment)  |   |

### **Other Federal, State, Tribal or Local Water Pollution Control Regulations Not Listed Above (identify)**



- |                                     |  |
|-------------------------------------|--|
| 17. Corresponding state regulations |  |
| 18.                                 |  |

### **Drinking Water Regulations**

- |  |   |
|--|---|
| 1. Underground Injection and Control Regulations, Criteria and Standards (40 CFR 144, 146) | X |
| 2. National Primary Drinking Water Standards (40 CFR 141)                                  | X |
| 3. Community Water Systems, Monitoring and Reporting Requirements (40 CFR 141)             |   |
| 4. Permit Requirements for Appropriation/Use of Water from Surface or Subsurface Sources   |   |
| 5. Underground Injection Control Requirements  | X |
| 6. Monitoring, Reporting and Record keeping Requirements for Community Water Systems       |   |

### **Other Federal, State, Tribal or Local Drinking Water Regulations Not Listed Above (identify)**

- |                                    |  |
|------------------------------------|--|
| 7. Corresponding state regulations |  |
| 8.                                 |  |

### **Toxic Substances**

- |  |   |
|--|---|
| 1. Manufacture and Import of Chemicals, Record keeping and Reporting Requirements (40 CFR 704) |   |
| 2. Import and Export of Chemicals (40 CFR 707)   |   |
| 3. Chemical Substances Inventory Reporting Requirements (40 CFR 710)                           |   |
| 4. Chemical Information Rules (40 CFR 712)   |   |
| 5. Health and Safety Data Reporting (40 CFR 716)   |   |
| 6. Pre-Manufacture Notifications (40 CFR 720)  |   |
| 7. PCB Distribution Use, Storage and Disposal (40 CFR 761)                                     | X |
| 8. Regulations on Use of Fully Halogenated Chlorofluoroalkanes (40 CFR 762)                    |   |
| 9. Storage and Disposal of Waste Material Containing TCDD (40 CFR 775)                         |   |

### **Other Federal, State, Tribal or Local Toxic Substances Regulations Not Listed Above (identify)**

- |                                     |  |
|-------------------------------------|--|
| 10. Corresponding state regulations |  |
| 11.                                 |  |

### **Pesticide Regulations**

- |  |   |
|--|---|
| 1. FIFRA Pesticide Use Classification (40 CFR 162) | X |
|--|---|

2. Procedures for Disposal and Storage of Pesticides and Containers (40 CFR 165)	X
3. Certification of Pesticide Applications (40 CFR 171)	X
4. Pesticide Licensing Requirements	X
5. Labeling of Pesticides	X
6. Pesticide Sales, Permits, Records, Application and Disposal Requirements	
7. Disposal of Pesticide Containers	X
8. Restricted Use and Prohibited Pesticides	X

**Other Federal, State, Tribal or Local Pesticides Regulations Not Listed Above (identify)**

9. Corresponding state regulations including applicator certification.
10. \_\_\_\_\_

**Environmental Clean-Up, Restoration, Corrective Action**

1. Comprehensive Environmental Response, Compensation and Liability Act (Superfund) (identify)
- \_\_\_\_\_
- \_\_\_\_\_
2. RCRA Corrective Action (identify)
- \_\_\_\_\_
- \_\_\_\_\_

**Other Federal, State, Tribal or Local Environmental Clean-Up, Restoration, Corrective Action Regulations Not Listed Above (identify)**

3. \_\_\_\_\_
4. \_\_\_\_\_



## Western's Goals for Upper Colorado River Endangered Species Recovery

### **Current and Projected Land Holdings:**

	Growout Ponds	Habitat Easements
Colorado River	45 ac	50 ac
3 yr Goal	75 ac	1000 ac
Gunnison River	0 ac	0 ac
3 yr Goal	? ac	250 ac
Green River	7.5 ac	405 ac
3 yr Goal	25 ac	1000 ac

### **Current and Projected Propagation & Stocking:**

Razorback Sucker - 22,000/yr (total) from 20 genetic family lots to 5 locations in the three rivers.  
3 yr Goal - 100,000/yr (total) from 25 genetic family lots to 10 locations in the three rivers.

Colorado Pikeminnow - 60/yr to one location in the Green River.  
3 yr Goal - ? - Species status is currently stable and increasing.

Bonytail - 45,000/yr to 4 locations in three river systems.  
3 yr Goal - 100,000/yr to 10 locations in 4 river systems



# Section E

## Application and Participation Statement

On behalf of Western Area Power Administration  
[my facility],

I certify that

- I have read and agree to the terms and conditions, as specified in the *National Environmental Achievement Track Program Description* and in the *Application Instructions*;
- I have personally examined and am familiar with the information contained in this Application (including, if attached, the Environmental Requirements Checklist). The information contained in this Application is, to the best of my knowledge and based on reasonable inquiry, true, accurate, and complete, and I have no reason to believe the facility would not meet all program requirements;
- My facility has an environmental management system (EMS), as defined in the Achievement Track EMS requirements, including systems to maintain compliance with all applicable federal, state, tribal, and local environmental requirements, in place at the facility, and the EMS will be maintained for the duration of the facility's participation in the program;
- My facility has conducted an objective assessment of its compliance with all applicable federal, state, tribal, and local environmental requirements, and the facility has corrected all identified instances of potential or actual noncompliance;
- Based on the foregoing compliance assessment and subsequent corrective actions (if any were necessary), my facility is, to the best of my knowledge and based on reasonable inquiry, currently in compliance with applicable federal, state, tribal, and local environmental requirements.

I agree that EPA's decision whether to accept participants into or remove them from the National Environmental Achievement Track is wholly discretionary, and I waive any right that may exist under any law to challenge EPA's acceptance or removal decision.

I am the senior facility manager and fully authorized to execute this statement on behalf of the corporation or other legal entity whose facility is applying to this program.

Signature/Date Michael S. Hacskeylo 10/2/00

Printed Name/Title Michael S. Hacskeylo

Facility Name Western Area Power Administration

Facility Street Address (See attachment)

Facility ID Numbers (See attachment)

The National Environmental Performance Track is a U.S. Environmental Protection Agency program. Please direct inquiries to 1-888-339-PTRK or e-mail [ptrack@indecon.com](mailto:ptrack@indecon.com). Mail completed applications to:

The Performance Track Information Center  
c/o Industrial Economics Incorporated  
2067 Massachusetts Avenue  
Cambridge, MA 02140